

**ATTACHMENT A**

**STIPULATION OF FACTS**

*The undersigned parties stipulate and agree that if this case had proceeded to trial, this Office would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.*

On March 26, 2019, the Defendant, **RONDELL HENRY** (“**HENRY**”), left his workplace in Germantown, Maryland, in the middle of the workday. While driving in Virginia, **HENRY** observed a U-Haul van. **HENRY** followed the U-Haul to a parking garage in Alexandria, Virginia. After the driver departed the area, **HENRY** stole the U-Haul, leaving his personal vehicle in the parking garage.

**HENRY** continued to drive in the stolen U-Haul around metropolitan Washington, D.C., area, including Maryland and Virginia. At approximately 5:00 a.m. on March 27, 2019, **HENRY** traveled in the U-Haul to Dulles International Airport (“Dulles” and “the airport”), an airport serving international civil aviation, in Virginia. After arriving there, **HENRY** entered the terminal building. **HENRY** unsuccessfully attempted to follow another individual into a restricted area of the airport, but the other individual prevented **HENRY** from entering the restricted area.

**HENRY** left Dulles in the U-Haul and continued to drive in the metropolitan Washington, D.C., area. Later on the morning of March 27, 2019, **HENRY** drove to the National Harbor in Maryland, where **HENRY** parked the U-Haul.

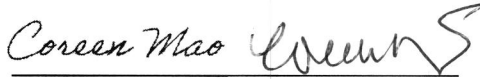
On March 27, 2019, the U-Haul that **HENRY** stole was located at National Harbor. On March 28, 2019, members of the Prince George’s County Police Department located and arrested **HENRY** at National Harbor.

During an interview following his arrest, on April 3, 2019, **HENRY** told law enforcement that he went to the airport because he “was trying to hurt people there” and he “was going to try to drive through a crowd of people.” **HENRY** further stated that “there wasn’t a big enough crowd” at the airport.

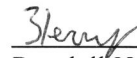
Driving through a crowd of people at Dulles was likely to endanger safety at that airport and to cause serious bodily injury or death. By stealing the U-Haul and driving it to Dulles to use

it to drive through a crowd of people, **HENRY** took a substantial step in an effort to accomplish this crime.

SO STIPULATED:



Jessica C. Collins  
Coreen Mao  
Jeffrey J. Izant  
Assistant United States Attorneys



Rondell Henry  
Defendant



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